



900 17th Street, N.W.  
Suite 1100  
Washington, DC 20006  
Phone: 202.783.0070  
Fax: 202.783.0534  
Web: [www.ccianet.org](http://www.ccianet.org)

**Computer & Communications Industry Association**

February 19, 2013

**VIA ELECTRONIC COMMENT FILING SYSTEM**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Policies Regarding Mobile Spectrum Holdings; WT Docket No. 12-269

Dear Ms. Dortch:

The Computer & Communication Industry Association (“CCIA”) hereby submits the attached study, *The Impact of Bidding Eligibility Conditions on Spectrum Auction Revenues*, prepared by Information Age Economics (“IAE”) for inclusion in the record of the above referenced proceeding.

In this proceeding, the Commission seeks input on whether to revise the rules and policies applicable to the acquisition of spectrum by mobile wireless carriers. CCIA has urged the Commission to take steps that would promote competition and reduce the current dominance of the top two wireless providers. In particular and among other things, it urged the Commission to create two screens – one for spectrum holdings below 1 GHz and another for all commercial mobile spectrum.

Contrary to what the dominant providers argue, imposing bidding eligibility restrictions would not reduce auction participation and auction revenues. The IAE report reviews auctions conducted in other countries. It finds that “open auctions” (those without bidding eligibility conditions) tend to favor deep pocketed and market dominant providers. It also concludes that auctions with eligibility conditions do not necessarily depress prices and in some cases might increase auction revenues by strengthening auction competition. Finally, the IAE report confirms what CCIA asserts in this proceeding – spectrum below 1 GHz is valued more highly than spectrum above 1 GHz.

Please contact the undersigned if there are any questions regarding this matter.

Sincerely,

Catherine R. Sloan  
VP, Government Relations  
Computer & Communications Industry Association  
Attachment